

7/13/2015 2:14:10 PM
15CV18181

1
2
3
4 **IN THE CIRCUIT COURT FOR THE STATE OF OREGON**
5 **FOR THE COUNTY OF MULTNOMAH**

6 **BENNY CLAVERO**, an individual,
7
8 Plaintiff,

9 v.

10 **UNDERWRITERS LABORATORIES,**
11 **INC.**, a foreign nonprofit corporation, **UL**
12 **VERIFICATION SERVICES, INC.**, a
foreign corporation, **UL RESPONSIBLE**
SOURCING, a foreign corporation, and **UL**
LLC., a foreign limited liability company,

13 Defendants.

Case No.

COMPLAINT (Wage Claim)

Claims Between \$10,000 and \$49,999

Subject to Mandatory Arbitration

JURY TRIAL DEMANDED

14 Comes now the Plaintiff, Benny Clavero, by and through the attorneys at Schuck Law,
15 LLC, and states and alleges as follows:

16 1.

17 At all times material herein, Defendant Underwriters Laboratories Inc. is a foreign
18 nonprofit corporation.

19 2.

20 At all times material herein, Defendant UL Verification Services, Inc. is a foreign
21 corporation.

22 3.

23 At all times material herein, Defendant UL Responsible Sourcing is a foreign
24 corporation.

25 ///

26

Page 1 - Complaint

SCHUCK LAW, LLC
10013 NE Hazel Dell Avenue #178 • Vancouver, WA 98685
Tel (360) 566-9243 • Fax (503) 575-2763

Attachment A

1 4.

2 At all times material herein, Defendant UL LLC. is a foreign limited liability
3 company.

4 5.

5 Defendant Underwriters Laboratories Inc., Defendant UL Verification Services, Inc.,
6 Defendant UL Responsible Sourcing and Defendant UL LLC. will be referred, herein, as
7 "Defendants."

8 6.

9 At all times material herein, Plaintiff was employed by Defendants in the State of
10 Oregon.

11 7.

12 At all times material herein, Defendants were doing business in Multnomah County in
13 Oregon.

14 8.

15 The Circuit Court of Oregon has personal jurisdiction over Defendants because they
16 are engaged in substantial and not isolated activities within this state, because the events set
17 forth in this complaint occurred in Oregon and because the claims arise out of services
18 actually performed by Plaintiff for the Defendants within Oregon.

19 9.

20 Plaintiff began working for Defendants on or about August 2014.

21 10.

22 Defendants employed Plaintiff as an at-will employee.

23 11.

24 Defendants did not contract with Plaintiff to work for any specific period of time.

25 ///

26 ///

12.

As part of Plaintiff's employment, Plaintiff was not subject to a collective bargaining agreement and/or part of a union.

13.

Defendants hired Plaintiff as a non-exempt, salaried employee.

14.

Defendants agreed to pay Plaintiff an annual salary of \$41,000.00, or \$19.75 per hour.

15.

Defendants also agreed to pay Plaintiff 1 ½ times his regular rate for all hours he works over 40 in a workweek.

CLAIM FOR RELIEF

(FLSA Overtime, Liquidated Damages)

16.

Plaintiff re-alleges all paragraphs herein as though fully alleged herein.

17.

Defendants are subject to the requirements of the Fair Labor Standards Act of 1938, 29 U.S.C. §§ 201-219 ("FLSA").

18.

Defendants are engaged in trade, commerce, transportation, transmission, and/or communication among and between the States.

19.

Defendants employ at least two people.

20.

Defendants have annual dollar volume of sales or business performed of at least \$500,000.

///

21.

Plaintiff is individually covered by the FLSA.

22.

Plaintiff's work while employed with Defendants regularly involves him in interstate commerce.

23.

Plaintiff regularly travels to locations in other states as part of his job with Defendants.

24.

Defendants hired Plaintiff as a non-exempt, salaried employee.

25.

Defendants agreed to pay Plaintiff an annual salary of \$41,000.00, or \$19.75 per hour.

26.

Defendants also agreed to pay Plaintiff 1 ½ times his regular rate for all hours he worked over 40 in a workweek.

27.

Defendants agreed to pay Plaintiff for time he spent traveling as part of his job with Defendants.

28.

The time Plaintiff spent traveling as part of his job is time worked and federal law requires that this travel time be compensated.

29.

The FLSA requires non-exempt employees be paid at 1 ½ time their regular rate for all hours over 40 in a work week.

30.

In determining the amount of overtime wages, the regular rate is required to include "all remuneration for employment paid to, or on behalf of, the employee." 29 USC § 207(e).

1 31.

2 During the three year period of employment before filing of this case, Defendants
3 allowed, suffered and permitted Plaintiff to perform work in excess of 40 hours per week for
4 the benefit of Defendants.

5 32.

6 Defendants failed to include all travel time when calculating the total number of hours
7 Plaintiff worked.

8 33.

9 When all travel time is included, during some work weeks, Plaintiff worked more
10 overtime than he was paid.

11 34.

12 When all travel time is included, during some work weeks, Plaintiff worked overtime
13 where he was paid no overtime wages.

14 35.

15 Because Defendants failed to include all travel time when calculating the total number
16 of hours Plaintiff worked, Defendants failed to pay Plaintiff 1 ½ times his regular hourly rate
17 for all hours Plaintiff worked in excess of 40 hours for a single workweek and there remains
18 due unpaid overtime in an amount to be determined.

19 36.

20 Defendants also failed to include all wages paid for travel time in Plaintiff's regular
21 rate when calculating overtime.

22 37.

23 Because Defendants failed to include all wages paid for travel time in Plaintiff's
24 regular rate when calculating overtime, Defendants failed to pay Plaintiff 1 ½ times his
25 regular hourly rate for all hours Plaintiff worked in excess of 40 hours for a single workweek
26 and there remains due unpaid overtime in an amount to be determined.

1 38.

2 Further, Plaintiff was paid a non-discretionary bonus during his employment with
3 Defendants.

4 39.

5 Defendants failed to include the non-discretionary bonus in Plaintiff's regular rate
6 when calculating overtime.

7 40.

8 Defendants failed to pay all overtime and premium wages due to Plaintiff as required
9 by the FLSA.

10 41.

11 Defendants were required to pay Plaintiff for all hours worked and all overtime wages
12 on Plaintiff's next regularly scheduled pay day under the FLSA.

13 42.

14 Defendants' conduct in failing to pay overtime wages and premium wages as alleged
15 herein was willful, and there remain due and unpaid overtime wages in amounts to be
16 determined.

17 43.

18 Plaintiff seeks damages in the form of overtime wages and overtime premium wages
19 for Defendants' failure to pay Plaintiff's overtime wages.

20 44.

21 Plaintiff seeks damages in the form of liquidated damages for Defendants' failure to
22 pay overtime wages on payday in an amount to be determined and attorney fees and costs
23 under the FLSA, plus pre- and post-judgment interest in the amount of 9% per annum
24 incurred herein under ORS 82.010.

25 **WHEREFORE**, Plaintiff demands judgment from Defendants:

26 **Upon Plaintiff's claim for relief for failing to pay FLSA overtime wages:**

1. Unpaid overtime wages in an amount to be determined.
2. Liquidated damages under the FLSA in an amount to be determined.
3. Pre- and post-judgment interest on all damage amounts in the amount of 9% per annum incurred herein, pursuant to ORS 82.010.
4. Costs, disbursements, and attorney fees under the FLSA. 29 USC 216(b).

Upon any counterclaim or defense asserted by Defendants without a objectively reasonable basis, or where Defendant disobeys a court order:

1. Plaintiff is entitled to recover attorney fees and costs pursuant to ORS 20.105.

DATED: July 8, 2015.

s/ Stephanie J. Brown
STEPHANIE J. BROWN, OSB 030019, WSB 42030
sbrown@wageclaim.org
Attorney for Plaintiff

Verified Correct Copy of Original 7/24/2015.

FILED
2015 JUL 23 PM 4:28
AFFIDAVIT OF SERVICE
CIRCUIT COURT
FOR MULTNOMAH COUNTY

State of Oregon

County of Multnomah

Circuit Court

Case Number: 15CV18181

Plaintiff:

Benny Clavero,

vs.

Defendant:

Underwriters Laboratories, Inc., et al.,

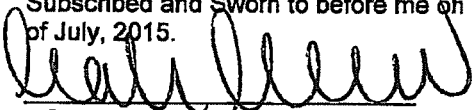
Received by RUSH PROCESS SERVICE, INC. to be served on Underwriters Laboratories, Inc. c/o CT Corporation System, Registered Agent, 388 State St., Suite 420, Salem, OR 97301.

I, Veronica T. Broeth, being duly sworn, depose and say that on the 16th day of July, 2015 at 3:25 pm, I:


Served the within named corporation by delivering a true copy of a **Summons; Complaint; First Request for Production of Documents** by personal service upon **Rylynn Poole, Service of Process Technician** who is authorized to accept service on behalf of the registered agent

I am a competent person 18 years of age or older and a resident of the state of service or this state and am not a party to nor an officer, director or employee of, nor attorney for any party, corporate or otherwise; and the person, firm, or corporation served is the identical one named in the action.

Subscribed and Sworn to before me on the 17th day
of July, 2015.


NOTARY PUBLIC




Veronica T. Broeth
Process Server

RUSH PROCESS SERVICE, INC.
2014 N.E. Sandy Blvd., Suite 204
Portland, OR 97232
(503) 232-3667

Our Job Serial Number: SKS-2015008655
Ref: Clavero

Verified Correct Copy of Original 7/24/2015.

**IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH**

BENNY CLAVERO, an individual,
Plaintiff,

UNDERWRITERS LABORATORIES, INC., a foreign
nonprofit corporation, **UL VERIFICATION SERVICES,**
INC., a foreign corporation, **UL RESPONSIBLE SOURCING,**
a foreign corporation, and **UL LLC**, a foreign limited liability
company,

Defendants.

Case No. 15CV18181

SUMMONS

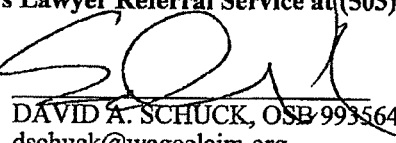
TO: Underwriters Laboratories, Inc.

IN THE NAME OF THE STATE OF OREGON: You are hereby required to appear and defend the complaint filed against you in the above-entitled cause within 30 days from the date of service of this summons on you; and if you fail to appear and defend, the plaintiff will apply to the court for the relief demanded in the complaint.

**NOTICE TO DEFENDANT:
READ THESE PAPERS CAREFULLY**

You must "appear" in this case or the other side will win automatically. To "appear" you must file with the court a legal paper called a "motion" or "answer." The "motion" or "answer" must be given to the court clerk or administrator within 30 days along with the required filing fee. It must be in proper form and have proof of service on the plaintiff's attorney or, if the plaintiff does not have an attorney, proof of service on the plaintiff.

If you have any questions, you should see an attorney immediately. If you need help in finding an attorney, you may call the Oregon State Bar's Lawyer Referral Service at (503) 684-3763 or toll-free in Oregon at (800) 452-7636.

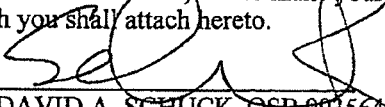

DAVID A. SCHUCK, OSB 993564, WSB 37285
dschuck@wageclaim.org
Attorney for Plaintiff
10013 NE Hazel Dell Ave. #178
Vancouver, WA 98685 (360) 566-9243

STATE OF WASHINGTON, County of Clark) ss

I, the undersigned attorney of record for the Plaintiff, certify that the foregoing is an exact and complete copy of the original summons in the above entitled action.

DAVID A. SCHUCK, OSB 993564, WSB 37285
dschuck@wageclaim.org
Attorney for Plaintiff

TO THE OFFICER OR OTHER PERSON SERVING THIS SUMMONS: You are hereby directed to serve a true copy of this summons, together with a true copy of the complaint mentioned therein, upon the individual(s) or other legal entity(ies) to whom or which this summons is directed, and to make your proof of service on the reverse hereof or upon a separate similar document which you shall attach hereto.


DAVID A. SCHUCK, OSB 993564, WSB 37285
dschuck@wageclaim.org
Attorney for Plaintiff

SCHUCK LAW, LLC
Attorneys at Law
10013 NE Hazel Dell Avenue #178 • Vancouver, WA 98685
Tel (360) 566-9243 • Fax (503) 575-2763

Verified Correct Copy of Original 7/24/2015.

FILED

2015 JUL 23 PM 4:28

AFFIDAVIT OF SERVICE CIRCUIT COURT
FOR MULTNOMAH COUNTY

State of Oregon

County of Multnomah

Circuit Court

Case Number: 15CV18181

Plaintiff:

Benny Clavero,

vs.

Defendant:

Underwriters Laboratories, Inc., et al.,

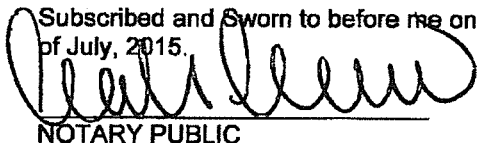
Received by RUSH PROCESS SERVICE, INC. to be served on UL, LLC c/o CT Corporation System,
Registered Agent, 388 State St., Suite 420, Salem, OR 97301.

I, Veronica T. Broeth, being duly sworn, depose and say that on the 16th day of July, 2015 at 3:25 pm, I:

Served the within named corporation by delivering a true copy of a **Summons; Complaint; First Request for Production of Documents** by personal service upon **Rylynn Poole, Service of Process Technician** who is authorized to accept service on behalf of the registered agent

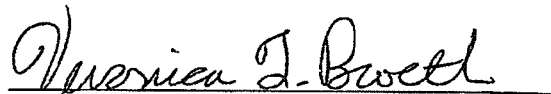
I am a competent person 18 years of age or older and a resident of the state of service or this state and am not a party to nor an officer, director or employee of, nor attorney for any party, corporate or otherwise; and the person, firm, or corporation served is the identical one named in the action.

Subscribed and Sworn to before me on the 17th day
of July, 2015.



NOTARY PUBLIC




Veronica T. Broeth
Process Server

RUSH PROCESS SERVICE, INC.
2014 N.E. Sandy Blvd., Suite 204
Portland, OR 97232
(503) 232-3667

Our Job Serial Number: SKS-2015008656
Ref: Clavero

Verified Correct Copy of Original 7/24/2015.

**IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH**

BENNY CLAVERO, an individual,
Plaintiff,

v.

UNDERWRITERS LABORATORIES, INC., a foreign
nonprofit corporation, **UL VERIFICATION SERVICES,**
INC., a foreign corporation, **UL RESPONSIBLE SOURCING,**
a foreign corporation, and **UL LLC**, a foreign limited liability
company,

Defendants.

Case No. 15CV18181

SUMMONS

TO: UL LLC.

IN THE NAME OF THE STATE OF OREGON: You are hereby required to appear and defend the complaint filed against you in the above-entitled cause within 30 days from the date of service of this summons on you; and if you fail to appear and defend, the plaintiff will apply to the court for the relief demanded in the complaint.

**NOTICE TO DEFENDANT:
READ THESE PAPERS CAREFULLY**

You must "appear" in this case or the other side will win automatically. To "appear" you must file with the court a legal paper called a "motion" or "answer." The "motion" or "answer" must be given to the court clerk or administrator within 30 days along with the required filing fee. It must be in proper form and have proof of service on the plaintiff's attorney or, if the plaintiff does not have an attorney, proof of service on the plaintiff.

If you have any questions, you should see an attorney immediately. If you need help in finding an attorney, you may call the Oregon State Bar's Lawyer Referral Service at (503) 684-3763 or toll-free in Oregon at (800) 452-7636.



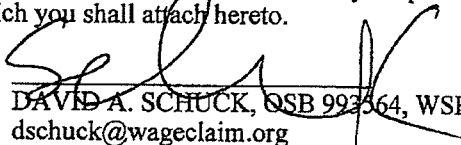
DAVID A. SCHUCK, OSB 993564, WSB 37285
dschuck@wageclaim.org
Attorney for Plaintiff
10013 NE Hazel Dell Ave. #178
Vancouver, WA 98685 (360) 566-9243

STATE OF WASHINGTON, County of Clark) ss

I, the undersigned attorney of record for the Plaintiff, certify that the foregoing is an exact and complete copy of the original summons in the above entitled action.

DAVID A. SCHUCK, OSB 993564, WSB 37285
dschuck@wageclaim.org
Attorney for Plaintiff

TO THE OFFICER OR OTHER PERSON SERVING THIS SUMMONS: You are hereby directed to serve a true copy of this summons, together with a true copy of the complaint mentioned therein, upon the individual(s) or other legal entity(ies) to whom or which this summons is directed, and to make your proof of service on the reverse hereof or upon a separate similar document which you shall attach hereto.



DAVID A. SCHUCK, OSB 993564, WSB 37285
dschuck@wageclaim.org
Attorney for Plaintiff

SCHUCK LAW, LLC
Attorneys at Law
10013 NE Hazel Dell Avenue #178 • Vancouver, WA 98685
Tel (360) 566-9243 • Fax (503) 575-2763

Verified Correct Copy of Original 7/24/2015.

FILED

2015 JUL 23 PM 4:28

AFFIDAVIT OF SERVICE

CIRCUIT COURT
FOR MULTNOMAH COUNTY

State of Oregon

County of Multnomah

Circuit Court

Case Number. 15CV18181

Plaintiff:

Benny Clavero,

vs.

Defendant:

Underwriters Laboratories, Inc., et al.,

Received by RUSH PROCESS SERVICE, INC. to be served on UL Responsible Sourcing, c/o Secretary of State - Corp. Division, 255 Capitol St. NE, Salem, OR 97310.

I, Veronica T. Broeth, being duly sworn, depose and say that on the **16th day of July, 2015 at 3:45 pm, I:**

SERVED the within named entity by delivering a true copy of the **Summons; Complaint; First Request for Production of Documents to Bob Broacek, PSR IV** at the address stated above

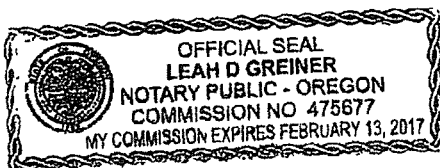
Additional Information pertaining to this Service:

Follow up mailing was sent to: UL Responsible Sourcing 47173 Benicia St Fremont, CA 94538

I am a competent person 18 years of age or older and a resident of the state of service or this state and am not a party to nor an officer, director or employee of, nor attorney for any party, corporate or otherwise, and the person, firm, or corporation served is the identical one named in the action

Subscribed and Sworn to before me on the 20th day
of July, 2015.

NOTARY PUBLIC



Veronica T. Broeth
Veronica T. Broeth
Process Server

RUSH PROCESS SERVICE, INC.
2014 N.E. Sandy Blvd., Suite 204
Portland, OR 97232
(503) 232-3667

Our Job Serial Number: SKS-2015008657
Ref: Clavero

Verified Correct Copy of Original 7/24/2015.

**IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH**

BENNY CLAVERO, an individual,
Plaintiff,

v.

UNDERWRITERS LABORATORIES, INC., a foreign
nonprofit corporation, **UL VERIFICATION SERVICES,**
INC., a foreign corporation, **UL RESPONSIBLE SOURCING,**
a foreign corporation, and **UL LLC.**, a foreign limited liability
company,

Defendants.

Case No. 15CV18181

SUMMONS

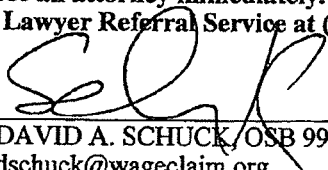
TO: UL Responsible Sourcing

IN THE NAME OF THE STATE OF OREGON: You are hereby required to appear and defend the complaint filed against you in the above-entitled cause within 30 days from the date of service of this summons on you; and if you fail to appear and defend, the plaintiff will apply to the court for the relief demanded in the complaint.

**NOTICE TO DEFENDANT:
READ THESE PAPERS CAREFULLY**

You must "appear" in this case or the other side will win automatically. To "appear" you must file with the court a legal paper called a "motion" or "answer." The "motion" or "answer" must be given to the court clerk or administrator within 30 days along with the required filing fee. It must be in proper form and have proof of service on the plaintiff's attorney or, if the plaintiff does not have an attorney, proof of service on the plaintiff.

If you have any questions, you should see an attorney immediately. If you need help in finding an attorney, you may call the Oregon State Bar's Lawyer Referral Service at (503) 684-3763 or toll-free in Oregon at (800) 452-7636.

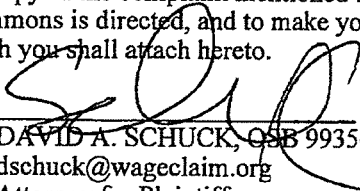

DAVID A. SCHUCK, OSB 993564, WSB 37285
dschuck@wageclaim.org
Attorney for Plaintiff
10013 NE Hazel Dell Ave. #178
Vancouver, WA 98685 (360) 566-9243

STATE OF WASHINGTON, County of Clark) ss

I, the undersigned attorney of record for the Plaintiff, certify that the foregoing is an exact and complete copy of the original summons in the above entitled action.

DAVID A. SCHUCK, OSB 993564, WSB 37285
dschuck@wageclaim.org
Attorney for Plaintiff

TO THE OFFICER OR OTHER PERSON SERVING THIS SUMMONS: You are hereby directed to serve a true copy of this summons, together with a true copy of the complaint mentioned therein, upon the individual(s) or other legal entity(ies) to whom or which this summons is directed, and to make your proof of service on the reverse hereof or upon a separate similar document which you shall attach hereto.


DAVID A. SCHUCK, OSB 993564, WSB 37285
dschuck@wageclaim.org
Attorney for Plaintiff

SCHUCK LAW, LLC
Attorneys at Law
10013 NE Hazel Dell Avenue #178 • Vancouver, WA 98685
Tel (360) 566-9243 • Fax (503) 575-2763

Verified Correct Copy of Original 7/24/2015.

AFFIDAVIT OF SERVICE

FILED
2015 JUL 23 PM 4:28
CIRCUIT COURT
FOR MULTNOMAH COUNTY

State of Oregon

County of Multnomah

Circuit Court

Case Number: 15CV18181

Plaintiff:

Benny Clavero,

vs.

Defendant:

Underwriters Laboratories, Inc., et al.,

Received by RUSH PROCESS SERVICE, INC. to be served on **UL Verification Services, Inc. c/o Secretary of State - Corp. Division, 255 Capitol St. NE, Salem, OR 97310.**

I, Veronica T. Broeth, being duly sworn, depose and say that on the **16th day of July, 2015 at 3:45 pm, I:**

SERVED the within named entity by delivering a true copy of the **Summons; Complaint; First Request for Production of Documents to Bob Broucek, PSR IV** at the address stated above.

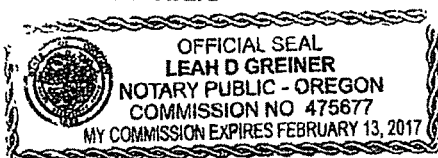
Additional Information pertaining to this Service:


Follow up mailing was sent to: **UL Verification Services Inc. 47173 Benicia St. Fremont, CA 94538.**

I am a competent person 18 years of age or older and a resident of the state of service or this state and am not a party to nor an officer, director or employee of, nor attorney for any party, corporate or otherwise; and the person, firm, or corporation served is the identical one named in the action.

Subscribed and Sworn to before me on the 20th day
of July, 2015.


NOTARY PUBLIC




Veronica T. Broeth
Process Server

RUSH PROCESS SERVICE, INC.
2014 N.E. Sandy Blvd., Suite 204
Portland, OR 97232
(503) 232-3667

Our Job Serial Number: **SKS-2015008658**
Ref: **Clavero**

Verified Correct Copy of Original 7/24/2015.

IN THE CIRCUIT COURT FOR THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

BENNY CLAVERO, an individual,
Plaintiff,

v.

UNDERWRITERS LABORATORIES, INC., a foreign
nonprofit corporation, UL VERIFICATION SERVICES,
INC., a foreign corporation, UL RESPONSIBLE SOURCING,
a foreign corporation, and UL LLC., a foreign limited liability
company,

Defendants.

Case No. 15CV18181

SUMMONS

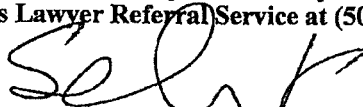
TO: UL Verification Services, Inc.

IN THE NAME OF THE STATE OF OREGON: You are hereby required to appear and defend the complaint filed against you in the above-entitled cause within 30 days from the date of service of this summons on you; and if you fail to appear and defend, the plaintiff will apply to the court for the relief demanded in the complaint.

NOTICE TO DEFENDANT:
READ THESE PAPERS CAREFULLY

You must "appear" in this case or the other side will win automatically. To "appear" you must file with the court a legal paper called a "motion" or "answer." The "motion" or "answer" must be given to the court clerk or administrator within 30 days along with the required filing fee. It must be in proper form and have proof of service on the plaintiff's attorney or, if the plaintiff does not have an attorney, proof of service on the plaintiff.

If you have any questions, you should see an attorney immediately. If you need help in finding an attorney, you may call the Oregon State Bar's Lawyer Referral Service at (503) 684-3763 or toll-free in Oregon at (800) 452-7636.

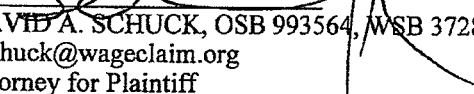

DAVID A. SCHUCK, OSB 993564, WSB 37285
dschuck@wageclaim.org
Attorney for Plaintiff
10013 NE Hazel Dell Ave. #178
Vancouver, WA 98685 (360) 566-9243

STATE OF WASHINGTON, County of Clark) ss

I, the undersigned attorney of record for the Plaintiff, certify that the foregoing is an exact and complete copy of the original summons in the above entitled action.

DAVID A. SCHUCK, OSB 993564, WSB 37285
dschuck@wageclaim.org
Attorney for Plaintiff

TO THE OFFICER OR OTHER PERSON SERVING THIS SUMMONS: You are hereby directed to serve a true copy of this summons, together with a true copy of the complaint mentioned therein, upon the individual(s) or other legal entity(ies) to whom or which this summons is directed, and to make your proof of service on the reverse hereof or upon a separate similar document which you shall attach hereto.


DAVID A. SCHUCK, OSB 993564, WSB 37285
dschuck@wageclaim.org
Attorney for Plaintiff

SCHUCK LAW, LLC
Attorneys at Law
10013 NE Hazel Dell Avenue #178 • Vancouver, WA 98685
Tel (360) 566-9243 • Fax (503) 575-2763